

HONORABLE BARBARA JACOBS ROTHSTEIN

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

CREEKSIDE ON SUNSET  
CONDOMINIUM ASSOCIATION, a  
Washington non-profit corporation,

**Plaintiff,**

EVANSTON INSURANCE COMPANY,  
SUCCESSOR BY MERGER TO ESSEX  
INSURANCE COMPANY, an Illinois  
corporation.

**Defendant.**

**NO. 2:22-cv-00534-BJR**

**STIPULATED MOTION AND ORDER**

**TO FILE AMENDED ANSWER**

## I. STIPULATION

Pursuant to F.R.C.P. 15(a)(2) and LCR 15, the parties, by and through their respective counsel, under LCR 15, hereby stipulate and respectfully request that the court enter an order allowing Defendant Evanston Insurance Company to file an amended answer to plaintiff's Complaint for Declaratory Relief. Pursuant to LCR 15, the proposed Amended Answer is attached as Exhibit A. The text to be added is highlighted and the deleted text is shown with a strikethrough.

**STIPULATED MOTION AND ORDER TO FILE  
AMENDED ANSWER – 1**

AMENDED ANSWER

**REED MCCLURE**  
ATTORNEYS AT LAW  
FINANCIAL CENTER  
1215 FOURTH AVENUE, SUITE 1700  
SEATTLE, WASHINGTON 98161-1087  
(206) 292-4900; FAX (206) 223-0152

1 HARPER | HAYES PLLC  
2

3 DATED: January 9, 2023

By /s/ Todd C. Hayes

4 Todd C. Hayes, WSBA #26361  
5 Charles K. Davis, WSBA #38231  
6 1200 Fifth Avenue, Suite 1208  
7 Seattle, WA 98101  
8 P: (206) 340-8010  
*Attorneys for Plaintiff*  
[todd@harperhayes.com](mailto:todd@harperhayes.com)  
[cdavis@harperhayes.com](mailto:cdavis@harperhayes.com)

9 REED MCCLURE  
10

11 DATED: January 9, 2023

By /s/ Marilee C. Erickson

12 Marilee C. Erickson, WSBA #16144  
13 1215 4<sup>th</sup> Avenue, Suite 1700  
14 Seattle, WA 98161  
15 P: (206) 292-4900  
*Attorney for Defendant Evanston Insurance Company*  
[merickson@rmlaw.com](mailto:merickson@rmlaw.com)

16 DICKINSON WRIGHT PLLC  
17

18 DATED: January 9, 2023

By /s/ P. Bruce Converse

19 P. Bruce Converse  
20 1850 N. Central Avenue, Suite 1400  
21 Phoenix, AZ 85004  
22 P: (602) 285-5023  
*Attorney for Defendant Evanston Insurance Company*  
*Admitted pro hac vice*  
[bconverse@dickinson-wright.com](mailto:bconverse@dickinson-wright.com)

23  
24  
25  
STIPULATED MOTION AND ORDER TO FILE  
AMENDED ANSWER – 2  
Case: 2:22-cv-00534-BJR

REED MCCLURE  
ATTORNEYS AT LAW  
FINANCIAL CENTER  
1215 FOURTH AVENUE, SUITE 1700  
SEATTLE, WASHINGTON 98161-1087  
(206) 292-4900; FAX (206) 223-0152

## ORDER

IT IS HEREBY ORDERED that the parties' Stipulated Motion and Order to File Amended Answer is granted.

Dated: January 11, 2023

Barbara J Rothstein

---

**JUDGE BARBARA J. ROTHSTEIN**

**STIPULATED MOTION AND ORDER TO FILE  
AMENDED ANSWER - 3**

Case: 2:22-cv-00534-BJR

**REED MCCLURE**  
ATTORNEYS AT LAW  
FINANCIAL CENTER  
1215 FOURTH AVENUE, SUITE 1700  
SEATTLE, WASHINGTON 98161-1087  
(206) 292-4900; FAX (206) 223-0152